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11 Attorneys for PLAINTIFF
12 ROBERT HUNTER BIDEN

13 **UNITED STATES DISTRICT COURT**

14 **CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION**

14 ROBERT HUNTER BIDEN, an
15 individual,

16 Plaintiff,

17 vs.

18 PATRICK M. BYRNE, an individual,
19 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**PLAINTIFF ROBERT HUNTER
BIDEN'S REQUEST FOR
COUNSEL TO APPEAR
REMOTELY FOR SEPTEMBER 29,
2025 HEARING ON PLAINTIFF
ROBERT HUNTER BIDEN'S
MOTION FOR SANCTIONS;
DECLARATION OF BRYAN M.
SULLIVAN**

*[[Proposed] Order filed and served
concurrently herewith]*

Date: September 29, 2025
Time: 1:30 P.M.
Crtrm.: 10A

Judge: Hon. Stephen V. Wilson

1 **TO THE HONORABLE COURT, ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD**, Plaintiff Robert Hunter Biden (“Plaintiff”) hereby
3 respectfully requests permission from this Court for his Counsel, Bryan M. Sullivan,
4 Esq., to appear remotely by way of videoconference (e.g. Zoom) for the hearing on
5 Plaintiff’s Motion for Sanctions scheduled in this case for September 29, 2025 at 1:30
6 p.m. (the “Hearing”). Good cause exists to grant this request because Mr. Sullivan
7 has been involved in all aspects of the case. (Declaration of Bryan M. Sullivan, at ¶
8 2.) However, at this time, Mr. Sullivan is unable to be in the State of California on,
9 Monday, September 29, 2025, due to the fact that he resides in Virginia and has
10 family/child care obligations that prevent him from traveling to California and
11 attending the Hearing in person at that time, for which he received notice on Monday,
12 September 15, 2025. Accordingly, Plaintiff respectfully requests that the Court grant
13 this request for Mr. Sullivan to appear remotely by videoconference at the Hearing.

14 Dated: September 15, 2025

EARLY SULLIVAN WRIGHT
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16
17 By: /s/ Bryan M. Sullivan

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Attorneys for Plaintiff
Robert Hunter Biden

DECLARATION OF BRYAN M. SULLIVAN

I, Bryan M. Sullivan, declare and state as follows:

1. I am counsel of record for Plaintiff Robert Hunter Biden (“Plaintiff”) in the above-entitled action and am over the age of 18. I hereby submit this declaration in support of Plaintiff’s Request for Counsel to Appear Remotely for the hearing on Plaintiff’s Motion for Sanctions scheduled in this case for September 29, 2025 at 1:30 p.m. (the “Hearing”). If called as a witness, I would and could testify to the matters contained herein.

2. I have been involved in all aspects of this case, and my participation in the Hearing is, therefore, necessary.

3. I just received notice of the September 29, 2025 hearing on September 15, 2025 and am unable to be in the State of California on September 29, 2025 because I reside in Virginia and have family/child care obligations that week that prevent me from traveling to California and attending the Conference in person.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 15th of September, 2025, at Roanoke, Virginia.

/s/ Bryan M. Sullivan
Bryan M. Sullivan